

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

UNITED STATES OF AMERICA

v.

CHRISTOPHER JORDAN

Case No. 19-cr-00669

Hon. Edmond E. Chang

**DEFENDANT CHRISTOPHER JORDAN’S UNOPPOSED MOTION FOR LEAVE TO
FILE UNDER SEAL PORTIONS OF HIS SENTENCING MEMORANDUM, PORTIONS
OF THE DECLARATION OF ANNE M. EVANS, AND CERTAIN EXHIBITS
IN SUPPORT OF HIS SENTENCING MEMORANDUM**

Defendant Christopher Jordan, by and through his undersigned counsel, respectfully moves this Court for leave to file under seal portions of his Sentencing Memorandum (“Sentencing Memo”) as well as portions of the Declaration of Anne M. Evans in Support of the Sentencing Memo (“Evans Declaration”) and certain of its accompanying exhibits, stating as follows in support thereof:

1. Mr. Jordan’s Sentencing Memo contains highly sensitive information related to Mr. Jordan’s childhood, medical history, and mental health condition, and refers to letters of support written by Mr. Jordan’s family and friends, some of which address these sensitive topics. The Sentencing Memo also identifies by name Mr. Jordan’s two minor children.

2. The Sentencing Memo will be accompanied by the Evans Declaration, as well as a number of exhibits.

3. The Evans Declaration identifies by name Mr. Jordan’s two minor children.

4. Exhibits A-L to the Evans Declaration are letters of support written by Mr. Jordan’s family and friends. Some of these letters contain references to the names of Mr. Jordan’s two

minor children, highly sensitive information relating to Mr. Jordan's mental health condition, and private information about several letter writers (including personal contact details and sensitive health information). Sealing this information is warranted to protect the personal data and privacy of Mr. Jordan, his minor children, and the authors of the letters.

5. Exhibit M contains a letter written by Renee Ronchi, B.S.N., C.A.D.C., of Willow Tree/Integrity House. The letter contains highly sensitive information regarding Mr. Jordan's mental health. Sealing this information is warranted to protect Mr. Jordan's privacy.

6. Exhibit N contains Mr. Jordan's objections and corrections to the Presentence Investigation Report ("PSR"). Because the PSR is a highly sensitive, non-public document, the objections and corrections should also be filed under seal.

7. Exhibit O contains a set of police reports regarding Mr. Jordan from January 2017 to August 2019. Sealing this information is warranted to protect Mr. Jordan's privacy, because these records contain highly sensitive personal information.

8. Exhibit Q contains the full transcripts of Mr. Jordan's two-day deposition testimony before the staff of the U.S. Commodity Futures Trading Commission on September 15 and 16, 2010. Although limited portions of these transcripts were admitted at trial as Government Exhibits 55 and 56, the full transcripts have not previously been made public and were not received into evidence at trial. Sealing these transcripts is warranted because they concern a non-public investigation.

9. In accordance with Local Rule 26.2(c), Mr. Jordan will provisionally file under seal a copy of the Sentencing Memo, the Evans Declaration, and exhibits, and at the same time will file public-record versions of the Sentencing Memo, the Evans Declaration, and exhibits, redacting the

sensitive portions of all documents and excluding the limited subset of exhibits that will be filed completely under seal (Exhibits M, N, O, Q).

10. Pursuant to Local Criminal Rule 12.1 and this Court's Individual Procedures for Motion Practice, counsel for Mr. Jordan conferred with the government about this motion on July 24, 2023. The government indicated that it has no objection to this motion.

WHEREFORE, for the reasons stated above, Mr. Jordan respectfully asks that the Court allow Mr. Jordan to file the aforementioned portions of his Sentencing Memo, the Evans Declaration, and the accompanying exhibits under seal.

Dated: July 25, 2023
New York, New York

Respectfully Submitted,

/s/ James J. Benjamin, Jr.

James J. Benjamin, Jr.

Parvin D. Moyne

Anne M. Evans

Sean M. Nolan

AKIN GUMP STRAUSS HAUER & FELD LLP

One Bryant Park

New York, NY 10036

(212) 872-1000

Megan Cunniff Church

MOLOLAMKEN LLP

300 N. LaSalle Street

Suite 5350

Chicago, Illinois 60654

(312) 450-6700

Counsel for Christopher Jordan